



144931

State of Illinois
Environmental Protection Agency
Scrap Tire Storage Site Inspection Report

County St. Clair Site Code 16300001ST
Facility Name Midwest Rubber Reclaiming Co. Inspection Date 08/12/88
Time: from 09:15 a.m. to 09:45 a.m. Photos Taken: yes (#) no (X)
Samples Taken: yes (#) no (X) Inspector W. Schaufelberger, Jr. Ducher
Interviewed Loader Operator Region 6 Site Phone # 618/337-6400
Site Owner Midwest Rubber Reclaiming Co.
Mailing Address P.O. Box 2349 East St. Louis, IL 62202

Apparent Violation

1. Section 849.103 Reporting Requirements
 X > 50,000 tires on site
 5000 to 50,000 tires on site
 > 50 but < 5000 tires on site

Has the person notified the Agency per the requirements?

Yes X No

Section 849.104 Management Standards for the Storage of Scrap Tires

Has there been more than 50 scrap tires generated or received on site since May 15, 1988?

Yes X No

Note: If yes, answer the remaining questions; if no, proceed to narrative.

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Have these tires been either:

2. _____ b.1) Drained of water on the day of generation or receipt and kept dry by being;

- a) Placed within a closed container or structure; or
- b) Covered with an impermeable material; or
- c) Drained within 24 hours after each precipitation event.

Yes _____ No _____

or

3. _____ b.2) Drained of water on the day of generation or receipt and processed into converted tires within seven days?

Yes _____ No _____

4. _____ b.3) Drained of water on the day of generation or receipt and treated by a certified pesticide applicator to prevent mosquito development within seven days and as often as necessary to prevent mosquito development?

Yes ☒ No _____

5. _____ c. If the provisions of subsections (b) (2) or (b) (3) are utilized then has documentation concerning date of receipt and dates and method of tire conversion and/or treatment being maintained?

Yes ☒ No _____ N/A _____

6. _____ Section 849.105 Alternate Management Programs for Storage of Scrap Tires

If over 5000 tires are accumulated an alternate management program (different than required in 849.104) may be utilized if and only if the alternative program is filed with the Agency, and IDPH has approved the methods employed.

a) If an alternative management program is being used is that program being carried out consistent with the plan filed with the Agency?

Yes _____ No _____ N/A ☒

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

NARRATIVE INSPECTION REPORT DOCUMENT

Date of Inspection: August 12, 1988 Inspector: W. Schaufelberger, K. Dunbar
Site Code: 1 6 3 0 0 0 0 1 S T County: St. Clair
Site Name: Sauget/Midwest Rubber Reclaiming Co. Time: 9:15 - 9:45 a.m.

GENERAL REMARKS

On August 12, 1988, Kelly Dunbar and I visited Midwest Rubber Reclaiming Co. in Sauget, IL. We went in response to a complaint of mosquitos in the tire storage yard. We spoke to George Martychenko, Purchasing Manager, to inform him we were there for an inspection. He did not escort us. We proceeded to the yard and inspected areas where mosquitos would most likely be. We could not find any tires holding water (thus no larvae were present). I spoke to a loader operator in the yard. I asked if he had noticed a mosquito problem, he replied he had not and that the facility had sprayed the area twice during the summer with a pesticide. There was no evidence of a mosquito problem at this facility.

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D.L.P.C. COMPLAINT INVESTIGATION FORM

St. Clair - 163000015T
East St. Louis / Midwest Rubber Reclaiming Co.
Date Received 8/9/88 By W. Schaufelberger By Phone X In Person By Mail
Complainant [REDACTED] Respondent Midwest Rubber Reclaiming Co.
Address [REDACTED] Address P.O. Box 2349 East St. Louis, IL
Telephone Telephone 618/337-6400
Directions to Source

Complaint Details [REDACTED] reported there are a large
number of mosquitos being harbored the tire
storage yard at Midwest Rubber

INVESTIGATION FINDINGS

Date 8-12-88 Time 9:15-9:45 By W. Schaufelberger
Interviewed Operator Weather 90° Sunny Photos 0
Violations Observed Tires were inspected to see
if they were holding water (thus harboring
mosquitos) No tires observed were holding
water. I spoke briefly with a loader
Respondent's Remarks operator. I asked if there
was much of a mosquito problem. He
replied he hadn't noticed any and that
the area had been sprayed twice
during the summer for mosquitos

FOLLOW-UP ACTION

Refer to File Opened - Yes No

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ILLINOIS DEPARTMENT OF
PUBLIC HEALTH

A Healthier Today For A Better Tomorrow

Bernard J. Turnock, M.D., Director

April 17, 1989

George Martychenko
Purchasing Manager
Midwest Rubber Reclaiming Division
P.O. Box 2349
E. St. Louis, IL 62202-2349

Dear Mr. Martychenko:

In response to your letter of March 16, 1989, we have reviewed your proposal for an Alternative Management Program (Section 849.105) under the Illinois Pollution Control Board's proposed rule - "Managing Scrap Tire Accumulations for the Control of Mosquitoes, Part 849". Please note that Section 849.105 requires that the final plan (including a statement of substantial equivalency from this office) be submitted to Mr. Gerra Savage, Illinois Environmental Protection Agency, Land Pollution Field Operations, 2200 Churchill Rd., Springfield, IL 62708.

Weekly Surveillance Program

A. Although the proposal states that landing rate counts will be conducted by the mosquito control contractor, there is no explanation about the duration of the sampling period. In addition, the proposal does not explain how the data from the landing rate counts of biting mosquitoes will be used in the control program.

B. The proposal states that the surveillance program will be conducted from April through September. The proposed rule (second notice) dated February 23, 1989, states in Section 849.104 that the tires must be stored dry, covered, or treated with insecticide to prevent the development of mosquitoes from April 1 to November 1. The proposal must be revised to extend the program through October 31.

Mosquito Larvae Control Program

A. The proposal states that "An insecticide treatment will be recommended if mosquito larvae are present in tires." We assume that the contractor means an insecticide treatment will be applied rather than just "recommended". In addition, the proposal does not state what criteria will trigger the application of a larvicide - i larva per tire or 1 per 250 tire sample?

B. Although the proposal states that a power back-pack will be used to evenly distribute the granules through the pile, it is not clear if there will be any post-treatment evaluation of the application by sampling tires for granules or larvae. This evaluation could be completed during the weekly inspection of the tires for mosquito larvae.

Adult Mosquito Control

The proposal states that adulticiding will be conducted on an "As needed basis". The contractor needs to define what criteria will be used to initiate adulticiding. A generally accepted threshold for biting mosquitoes which will trigger adulticiding is 1 bite in 5 minutes. The contractor should establish a threshold for adulticiding based on the mosquito landing counts conducted during the weekly survey. The threshold should be based on the presence of container-breeding mosquitoes (Aedes albopictus, Ae. triseriatus, Culex pipiens and similar species) rather than other species of adult mosquitoes which may be present on the site, but do not breed in containers.

The proposal has the basic elements of an effective mosquito control program. However, there are certain points of the proposal that need to be clarified:

1. The duration of the weekly mosquito landing sample must be defined. The contractor must state how the data from the collection will be used in the program.
2. The program should be conducted from April 1 to October 31, rather than from April 1 to September 30. (Postponed this year until May 1, 1989).
3. The proposal should clearly state:
 - a) the criteria used by the contractor to initiate larviciding and adulticiding;
 - b) what procedures will be followed to evaluate the effectiveness of larviciding and adulticiding.

If you have any questions about our review of your proposal, please contact me at 217-782-5380.

Sincerely,

Harvey J. Dominick

Harvey J. Dominick, Section Chief
Pesticides and Vector Control
Division of Environmental Health

cc: John A. Rightor, McCloud & Co.
Glenn Savage, ICPA
John Marlin, PCB
Clint Mudgett, IDPH
Region 4, IDPH

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Bernard J. Turnock, M.D., Director

May 31, 1989

George Martychenko
Midwest Rubber Reclaiming Division
P.O. Box 2349
East St. Louis, IL 62202-2349

Statement of Equivalency: Section 849.105 - Alternate Management Programs
for Storage of Scrap Tires

Dear Mr. Martychenko:

In your letter of May 5, 1989, you provided additional details of your mosquito control proposal for an Alternate Management Program for Storage (Section 849.105). We believe your proposal has the following components:

A. Weekly Surveillance Program

A minimum of 250 tires will be inspected for the presence of mosquitoes and/or the absence of suitable breeding conditions. Mosquito specimens will be identified to species when needed. Records will be kept concerning breeding activity, species collected, areas of collection, general conditions of tires and treatment activities. Six landing rate counts, each 5 minutes in duration, will be conducted during the weekly surveillance program. This data will be used to determine the mosquito species present in the tire yard and to determine the need for adulticiding activities. The surveillance program will be conducted from April 1 through October 31.

B. Mosquito Larvae Control Program

Treatment of Abate 5% CCG larvicide will be recommended if any (1 per 250 tire sample) mosquito larvae are present breeding in tires. The application must be approved by Midwest Rubber prior to the treatment. The larvicide will be applied with a power back-pack blower to evenly distribute the granules within and over the tire pile. A post-treatment evaluation of the granule distribution and the effectiveness of the treatment will be conducted during the weekly inspection. It is recommended that an initial application of the Abate 5% CCG be conducted during the month of April.

C. Adult Mosquito Control

Adulticiding will be recommended when the average biting rate (six samples) of container-breeding mosquitoes is greater than 1 bite per 5 minute sample. Midwest Rubber must approve the treatment prior to the application. Scourge Mosquito Adulticide will be applied by ULV (ultra-low-volume) application.

The effectiveness of the adulticiding program will be determined by biting rate counts conducted during the weekly inspection.

D. Vegetation Management

During a phone conversation with John Rightor on May 15, 1989, he stated that McCloud Co. had a contract with Midwest Rubber to control weeds and other vegetation on the Midwest property. As one of the requirements of this Alternative Management Program, weeds and other vegetation will be removed or prevented from growing in the tire yards to eliminate cover for adult mosquitoes and to prevent leaf litter from accumulating in stored tires.

If the above program is conducted properly, the Alternative Management Program (Sec. 840.105) will achieve results substantially equivalent to those that would be achieved by meeting the full requirements of Sec. 849.104. Please remember to submit a copy of your mosquito control proposal and a copy of this statement of equivalency to Mr. Glenn Savage, Illinois Environmental Protection Agency, Division of Land Pollution Field Operations, 2200 Churchill Road, Springfield, Illinois 62708.

If you have any questions, contact me or Dr. Linn D. Haramis at 217/782-5830.

Sincerely,

Harvey J. Dominick

Harvey J. Dominick, Section Chief
Pesticides and Vector Control

cc: John Rightor, W.B. McCloud Co.
Glenn Savage, IEPA
John Marlin, PCB
Tom Walker, IDA
East Side Health District
Clint Mudgett, IDPH
Region 4, IDPH

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